

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

STIPULATION AND AGREED ORDER REGARDING MEDIATION

WHEREAS, on July 29, 2022, Free Speech Systems, LLC (“FSS”) filed a voluntary petition for relief under chapter 11 subchapter V of the Bankruptcy Code, initiating Case No. 22-60043 (“FSS Bankruptcy Case”).

WHEREAS, on December 2, 2022, Alexander E. Jones (“Jones”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, initiating Case No. 22-33553 (“Jones Bankruptcy Case”).

WHEREAS, FSS filed a complaint against various defendants, including but not limited to PQPR Holdings Limited LLC (“PQPR”), JLJR Holdings, LLC (“JLJR”), PLJR Holdings LLC (“PLJR”), David Jones (“Dr. Jones”), and Carol Jones (“Mrs. Jones”)(together with the Trustee and FSS, the “Parties”), initiating the adversary proceeding styled as *Free Speech Systems LLC v. PQPR Holdings Limited LLC*, Adversary Proceeding No. 23-03127 (“PQPR Adversary”)

WHEREAS, on June 14, 2024, the Court entered an *Order* [DE 708, Jones Bankruptcy Case] converting the Jones Bankruptcy Case from a case under chapter 11 of the Bankruptcy Code to a case under chapter 7 of the Bankruptcy Code.

WHEREAS, upon conversion of the Jones Bankruptcy Case to a case under chapter 7 of the Bankruptcy Code, Christopher R. Murray was duly appointed as the chapter 7 trustee (“Trustee”) of the Debtor’s bankruptcy estate (“Estate”).

WHEREAS, on June 21, 2024, the Court entered an *Order Dismissing Case* [DE 956, FSS Bankruptcy Case] (“Dismissal Order”) in the FSS Bankruptcy Case.

WHEREAS, among other things, the Court expressly retained jurisdiction over the PQPR Adversary, as set forth in the Dismissal Order.

WHEREAS, on September 25, 2024, the Court entered its *Order Supplementing Order Dismissing Case* [DE 1021, FSS Bankruptcy Case](“Supplemental Dismissal Order”), vesting all property of FSS in the Estate and control of such property in the Trustee, including the authority to operate the business of FSS pursuant to section 721 of the Bankruptcy Code.

WHEREAS, the Parties wish to mediate disputes between them, including but not limited to those disputes that are the subject of the PQPR Adversary.

WHEREAS, the Parties agreed to mediate with Bankruptcy Judge H. Christopher Mott (Retired)(“Mediator”) on January 3, 2024 (“Mediation”).

NOW, THEREFORE, IT IS STIPULATED AND AGREED BY THE PARTIES HERETO AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED THAT:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.

2. Bankruptcy Judge H. Christopher Mott (Retired) is hereby appointed as an independent Mediator, as requested by the Parties. Judge Mott (Retired) shall not be paid and shall not receive any compensation from the Parties or anyone else for serving as Mediator.

3. The Parties are authorized to mediate with Bankruptcy Judge H. Christopher Mott (Retired) at the Mediation scheduled for January 3, 2024 or as otherwise agreed in writing by the Parties and subject to the availability of the Mediator.

4. The Mediation shall be conducted in Austin, Texas at a location and time agreed upon by the Parties and the Mediator.

5. The Parties are authorized to mediate any disputes between them, including but not limited to disputes that are the subject of the PQPR Adversary.

6. Dr. Jones and Mrs. Jones shall attend the mediation in person. Parties acting through an individual who is acting in a representative capacity shall have a representative present at the Mediation with authority to resolve the mediated disputes. The Parties shall be represented by counsel at the Mediation. The Parties shall cooperate with the Mediator to provide the Mediator with such information (including, but not limited to, mediation statements), as may be requested by the Mediator for use in connection with Mediation.

7. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court's approval.

8. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

Dated: December 20, 2024.

IT IS SO ORDERED.

Christopher M. Lopez
United States Bankruptcy Judge

AGREED AS TO FORM AND SUBSTANCE:

<p><u>/s/ Erin E. Jones</u> Erin E. Jones (TX 24032478) JONES MURRAY LLP 602 Sawyer St., Suite 400 Houston, TX 77007 Tel. (832) 529-1999 Fax. (832) 529-3393 erin@jonesmurray.com</p> <p>AND</p> <p>Joshua W. Wolfshohl (TX 24038592) Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 (713) 226-6000 (713) 228-1331 (fax) jwolfshohl@porterhedges.com</p> <p>CO-COUNSEL FOR CHRISTOPHER R. MURRAY, CHAPTER 7 TRUSTEE</p> <p>By: <u>/s/ Stephen W. Lemmon (with permission)</u> Stephen W. Lemmon (TX 12194500) STREUSAND, LANDON, OZBURN & LEMMON, LLP 1801 S. Mopac Expressway, Suite 320 Austin, Texas 78746 Telephone: (512) 236-9900 Facsimile: (512) 236-9904 lemmon@slollp.com</p> <p>ATTORNEY FOR PQPR HOLDINGS LIMITED LLC</p>	<p><u>/s/ Stephen A. Roberts (with permission)</u> Stephen A Roberts (TX 17019200) STEPHEN A ROBERTS, PC 2701 Wooldridge Dr Austin, TX 78703-1953 Telephone : 512-431-7337 Email: sroberts@srobertslawfirm.com</p> <p>ATTORNEY FOR CAROL JONES AND DAVID JONES, INDIVIDUALLY AND IN THEIR REPRESENTATIVE CAPACITY FOR PLJR HOLDINGS LLC AND JLJR HOLDINGS LLC</p>
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